

REMARKS

1. Claims 1-14 are pending in the application. New Claim 15 has been added. Applicant is grateful for the indication that claims 6 and 11 would be allowable with certain amendments. In view of the foregoing amendments and following remarks, Applicant requests reexamination of the application and reconsideration of the rejection of the unallowed claims.

2. Rejections under 112, Second Paragraph. Claims 1-8 stand rejected as being indefinite for failing to particularly point out and distinctly claim the subject matter of the invention. Applicant respectfully traverses this rejection. The Examiner argues that the die plate cannot be "fixedly mounted" to the rotary die cylinder and "adjustably" mounted at a second position. This is not correct, as the die plate is a thin material which is wrapped around the cylinder, and is flexible. Since the plate is flexible, if it is held rigid at a first position, the die plate may be moved a small amount at other positions with respect to the first position. When the die plate is misaligned, it does not cut accurately. Applicant's invention is critical to help account for such small misalignment. Applicant respectfully requests that this rejection be withdrawn.

3. Rejections under 102(b). Claims 1, 2, 5 and 8 stand rejected over Cracchiolo et al (US 5,088,367). Applicant respectfully traverses this rejection. Independent Claim 1 has been amended to incorporate the limitations of claim 6, reciting a set screw which engages an external surface of the external eccentric. This element is not taught or

suggested in Cracchiolo et al. Claims 2, 5 and 8 depend from claim 1 and are allowable for at least the same reasons as claim 1. Applicant therefore respectfully requests that the rejection be withdrawn.

4. Rejections under 103(a). Claims 1-5, 8-10, 13 and 14 stand rejected over Cracchiolo et al in view of Warner (U.S. 3,122,048). Applicant respectfully traverses this rejection. Claim 1, as amended, recites the limitations of claim 6: a set screw which engages an external surface of the external eccentric. This element is not taught or suggested in Cracchiolo et al. Nothing in Warner teaches or suggests, either alone or in combination with Cracchiolo et al, this combination of elements. Claims 2-4 and 8 depend from Claim 1 and are therefore allowable for at least the same reasons as claim 1. Applicant respectfully requests that this rejection be withdrawn.

Independent claim 9 recites both an external eccentric and an internal eccentric mounted in the central opening of the external eccentric. Cracchiolo et al shows a small die segment 30 which fits in a recess in a die cylinder 10. Cam 56 is used to adjust the position of the die segment with respect to a die cylinder 10. However, Cracchiolo et al does not teach or suggest a second eccentric, or the second eccentric mounted in the central opening of an external eccentric. Warner does not cure the deficiencies of Cracchiolo et al, either alone or in combination, as it too only shows a single eccentric. Claim 9 recites a highly advantageous combination of elements allowing much greater precision in adjustment than known rotary cutting tools. Claims 10, 13 and 14 depend

from claim 9 and are therefore allowable for at least the same reasons as claim 9.

Applicant respectfully requests that this rejection be withdrawn.

Claims 1-5, 7-10 and 12-14 stand rejected over Cracchiolo et al in view of Le (US 4,789,287). Applicant respectfully traverses this rejection. Claim 1, as amended, recites the limitations of claim 6: a set screw which engages an external surface of the external eccentric. This element is not taught or suggested in Cracchiolo et al. Nothing in Le teaches or suggests, either alone or in combination with Cracchiolo et al, this combination of elements. Claims 2-5 and 7-8 depend from Claim 1 and are therefore allowable for at least the same reasons as claim 1. Applicant respectfully requests that this rejection be withdrawn.

Independent claim 9 recites an external eccentric and an internal eccentric, with the internal eccentric mounted in the central opening of the external eccentric. As noted above, Cracchiolo et al shows a small die segment 30 which fits in a recess in a die cylinder 10. Cam 56 is used to adjust the position of the die segment with respect to a die cylinder 10. However, Cracchiolo et al does not teach or suggest an internal eccentric mounted in a central opening of an external eccentric. Moreover, the design of Cracchiolo et al is disadvantageous in that the cutting surfaces of the die segment must be offset from the cutting surfaces of the rest of the cylinder, thereby introducing a new error in position of some of the cutting surfaces in an attempt to correct for misalignment elsewhere. Le does not cure the deficiencies of Cracchiolo et al, either alone or in combination, as it too only shows a single eccentric. Claims 10, 12 and 14

depend from claim 9 and are therefore allowable for at least the same reasons as claim 9. Applicant respectfully requests that this rejection be withdrawn.

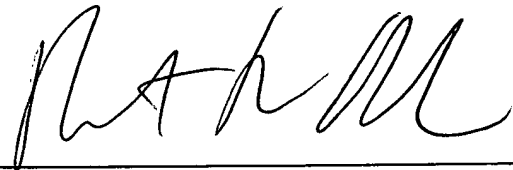
New Claim 15. Applicant has added New Claim 15, which is similar to claim 1, but instead of reciting the elements associated with the set screw, recites that "all of the cutting blades positioned circumferentially around the rotary die cylinder are formed as unitary extensions of the die plate". Cracchiolo shows a small die segment 30 with a few cutting blades, but most of the cutting blades are on the dies. Applicant respectfully requests that this claim be allowed as well.

CONCLUSION

In view of the foregoing amendments and remarks, Applicant requests withdrawal of the rejection of the claims and allowance of the application.

Respectfully Submitted,

Alan R. Pfaff, Jr.

A handwritten signature in black ink, appearing to read 'Roth', written over a horizontal line.

Robert Kelley Roth
Attorney for Applicants
Miller, Canfield, Paddock and Stone
150 W. Jefferson, Suite 2500
Detroit, MI 48226
313-496-7568
313-496-8454 (fax)
roth@millercanfield.com



CERTIFICATE OF MAILING

I hereby certify that this paper is being sent via First Class Mail on June 20, 2005 to the Assistant Commissioner of Patents, Washington, DC 20231.

6/20/05
Date of Signature

By: [Signature]

DELIB:2625625.2\123869-00001